

Timothy Urling

Idaho Falls, ID 83404

August 19, 2013

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20462

**Complaint Against Mike Simpson for Congress
and Idaho Association of REALTORS®, Inc.**

Dear Madam/Sir:

MUR # 6752

This letter constitutes my formal complaint against Mike Simpson for Congress and Idaho Association of REALTORS®, Inc., for violations of 11 C.F.R. 114.2 in connection with an upcoming fundraising event featuring the Speaker of the United States House of Representatives, John Boehner.

A copy of the invitation is attached to this complaint. As you can see, the Idaho Association of REALTORS®, Inc.'s logo appears on the top of the invitation, and the body of the invitation states that "Congressman Mike Simpson and the Idaho Association of REALTORS® invite you to a special visit with Speaker John Boehner." The invitation requests a contribution of \$50 made payable to "Simpson for Congress." The disclaimer at the bottom of the invitation makes clear that Simpson for Congress paid for and thus authorized it.

According to a search of records on file with the Idaho Secretary of State, the Idaho Association of REALTORS®, Inc. is an incorporated entity. As the Commission's records indicate, Simpson for Congress is the principal authorized campaign committee of Mike Simpson, who is a candidate for re-election to the United States House of Representatives from Idaho's Second Congressional District. 11 C.F.R. § 114.2 forbids corporate contributions to federal candidates, as well as corporate facilitation of contributions to federal candidates. In Advisory Opinion 2007-10 (Reyes), the Commission ruled that the use of a corporation's name and logo on an invitation to a fundraiser for a federal candidate was illegal:

Corporate names, trademarks, and service marks are corporate resources Therefore, *neither a corporation nor its agents may use the corporation's names, trademarks, or service marks to facilitate the making of contributions to a federal political committee, and a federal political committee may not knowingly accept or receive facilitated*

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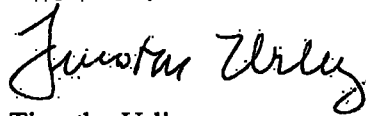
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contributions. See 11 CFR 114.2(d). . . . By allowing the committee to use the corporation's resources – in effect, by lending the corporation's resources to the committee – the corporation is using its resources to facilitate contributions to the Reyes Committee. . . . ***Such corporate facilitation is prohibited***

Accordingly, I request that you investigate this matter as provided by law, require Simpson for Congress to disgorge all contributions it received as a result of the Idaho Association of REALTORS®, Inc.'s illegal conduct, and issue fines against both parties.

Pursuant to the Commission's requirements, I am enclosing three copies of this Complaint and the illegal fundraising invitation, and I affirm that the statements in this letter are true, complete and accurate to the best of my knowledge, information and belief.

Respectfully submitted,



Timothy Urling

Encls.

STATE OF IDAHO

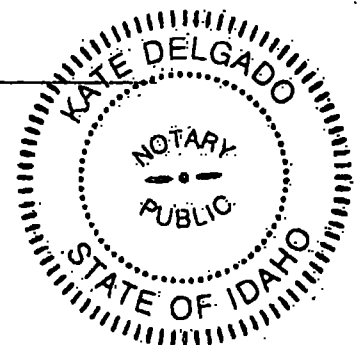
CITY/COUNTY OF Bonneville

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) to-wit:

Subscribed and sworn before me, a Notary Public of and for the above-stated jurisdiction, on August 19, 2013, by Timothy Urling.


Notary Public

My commission expires: August 26, 2017





Congressman Mike Simpson
and the
Idaho Association of REALTORS®

Invite you to a special visit with:

Speaker John Boehner
U.S. House of Representatives

11:30 am

Monday, August 26, 2013

Boise Centre on the Grove

\$50 per person

Lunch will be served

Reply by Friday, August 23

by email to Kendra@simpsonforcongress.com

or by calling 208-367-1927

Please make checks payable to:
"Simpson for Congress"

Mike
SIMPSON
IDAHO'S CONGRESSMAN

Federal law requires us to obtain and report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 per election cycle. Contributions by corporations, foreign nationals (non green-card holders), labor unions, and federal government contractors are prohibited. Not printed at Government Expense. PAID SIMPSON FOR CONGRESS.

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